

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

FEB 25 2015

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
JUAN FLORES-QUINTERO,)
a/k/a JUAN QUINTERO,)
)
Defendant.)

4:15CR0087 SNLJ/DDN

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about February 22, 2015, in St. Louis County, Missouri, within the Eastern District of Missouri, and elsewhere,

JUAN FLORES QUINTERO, a/k/a JUAN QUINTERO

the defendant herein, did travel in interstate commerce from the State of Ohio to the State of Missouri en route to the State of California, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, drug trafficking, in violation of Title 21, United States Code, Section 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit: the receipt, possession and concealment of approximately \$52,170.00 dollars in United States currency.

In violation of Title 18, United States Code, Section 1952.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(c), and Title 28 United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1952, as set forth in Count I of this Indictment; the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violation and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such offenses.

2. The specific property subject to forfeiture includes, but is not limited to:

a) \$52,170.00 in United States currency.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

MICHAEL A. REILLY #43908MO
Assistant United States Attorney